

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re
City of Detroit, Michigan
Debtor

Chapter 9
Case No. 13-53846
Hon.: Steven W. Rhodes

**JOINT MOTION TO JOIN JOHN P. QUINN'S MOTION FOR
PARTIAL STAY PENDING APPEAL**

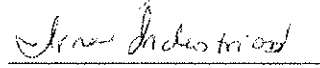
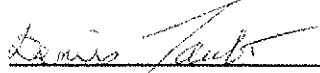
Creditors Dennis Taubitz and Irma Industrious seek to join the Motion of John P. Quinn for a Partial Stay Pending Appeal.

1. Creditors Dennis Taubitz and Irma Industrious objected to all of the Debtor's Plan of Adjustments.
2. Creditors' objections were wrongfully denied by the United States Bankruptcy Court when it entered the Order Confirming the Debtor's Plan of Adjustment.
3. The Court Order was entered on November 12, 2014, and not served upon the Creditors.
4. Creditors plan to appeal the wrongful decision of the United States Bankruptcy Court.
5. Creditors seek to join the Motion of John P. Quinn seeking a partial stay pending appeal.
6. The issues raised by Appellant John P. Quinn are also issues raised by Creditors Dennis Taubitz and Irma Industrious.
7. Creditors are planning an appeal with the same or similar issues.
8. In the interest of judicial economy, Creditors submit that the granting of their Order Motion would be the most expeditious handling of the matter.
9. Creditors sought the concurrence of Counsel for the Debtor, Heather Lennox by telephone but never received a response as of November 23, 2014.

FILED
2014 NOV 24 P 2:04
U.S. BANKRUPTCY COURT
E.D. MICHIGAN - DETROIT

WHEREFORE, Creditors Dennis Taubitz and Irma Industrious respectfully pray that this Honorable Court grant Creditors' Motion to Join John P. Quinn's Motion for Partial Stay Pending Appeal.

Respectfully submitted,



Dennis Taubitz
Irma Industrious
In Pro Per
Creditors
6002 Diamond Ruby – Suite 3
PMB 255
Christiansted, St. Croix, V.I. 00820
(313) 271-9842/ (340) 332-0006

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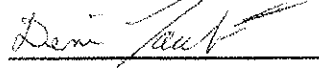
BRIEF IN SUPPORT

Creditors Dennis Taubitz and Irma Industrious submit that in the interest of judicial economy and efficiency, the Creditors Joint Motion to Join John P. Quinn's Motion for Partial Stay Pending Appeal should be granted. The Motion by John P. Quinn raised issues and arguments that Creditors have raised in previous objections.

Creditors also assert that their Motion for Joinder is timely and should be granted.

WHEREFORE, Creditors Dennis Taubitz and Irma Industrious respectfully pray that this Honorable Court grant Creditors' Motion to Join John P. Quinn's Motion for Partial Stay Pending Appeal.

Respectfully submitted,





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Irma Industrious
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In re
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Chapter 9
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ORDER GRANTING JOINDER MOTION

Upon consideration of the Joinder Motion filed in this case by Creditors Dennis Taubitz and Irma Industrious, and the Court being satisfied in the premises, it is hereby,

ORDERED AND ADJUDGED, that the Creditors Joint Motion to Join John P. Quinn's Motion for Partial Stay of Proceedings Pending Appeal is hereby **GRANTED**.

BANKRUPTCY JUDGE
Steven W. Rhodes

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re
City of Detroit,
Debtor

Chapter 9
Case No. 13-53846
Hon.: Steven W. Rhodes

**NOTICE OF JOINT MOTION TO JOIN JOHN P. QUINN'S MOTION
FOR PARTIAL STAY PENDING APPEAL**

Creditors Dennis Taubitz and Irma Industrious have filed papers with the court a Joint Motion to Join John P. Quinn's Motion for Partial Stay Pending Appeal.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Joint Motion to Join John P. Quinn's Motion for Partial Stay Pending Appeal or if you want the court to consider your views on the Joint Motion, to Join John P. Quinn's Motion for Partial Stay Pending Appeal, then within 14 days you or your attorney must:

File with the court a written request for a hearing {or if the court requires a written response, an answer explaining your position} at:

Attn: Bankruptcy Court Clerk
United States Bankruptcy Court
Eastern District of Michigan
211 West Fort Street
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Dennis Taubitz
6002 Diamond Ruby – Suite 3
PMB 255
Christiansted, St. Croix, V.I. 00820

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Irma Industrious
6002 Diamond Ruby – Suite 3
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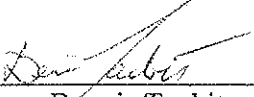
Heather Lennox
Bruce Bennett
Jones Day
555 South Flower Street – Fiftieth Floor
Los Angeles, CA 90071

Sam J. Alberts
Dentons US LLP
1301 K Street NW
Suite 600 East Tower
Washington DC 20005

Attend the hearing scheduled to be held on the date and time and Courtroom set by this court, United States Bankruptcy Court, Eastern District of Michigan, 211 West Fort Street, Detroit, MI 48226.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: Nov 24, 2011

Signature: 
Name(s): Dennis Taubitz
Irma Industrious

Address: 6002 Diamond Ruby – Suite 3
PMB 255
Christiansted, St. Croix, V.I. 00820

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

City of Detroit Debtor.

CASE NO: 13-53846
CHAPTER: 9
JUDGE: Steven W. Rhodes

PROOF OF SERVICE

I hereby certify that on Nov 24, 2014 (date of mailing), I served
copies as follows:

1. Document(s) served: JOINT Motion to Join John P. Quinn's Motion For
Partial stay pending Appeal
Brief in support
Proposed order
Proof of service

2. Served upon [name and address of each person served]:

Heather Lennet
Bruce Bennett
Jones DAY
555 South Flower St
11th Floor
Los Angeles, CA
90071

Sam d Roberts
Denton US LLP
1301 K Street NW
Suite 600 East Tower
Washington DC
20005

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2014 NOV 24 P 2:04
U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

3. By First Class Mail.

Dated: Nov 24, 2014

Dennis Taubitz
(Signature of Debtor) creditor

Print Name: Dennis Taubitz

Irma Induricos
(Signature of Co-Debtor) creditor

Print Name: Irma Induricos